

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	Case No.: 19-23752 GLT
MARTIN J. VIALE and DONNA M. VIALE, Debtors.	Chapter: 13

**OBJECTION OF CITIBANK, N.A., AS TRUSTEE FOR CMLTI ASSET TRUST TO
NOTICE OF PROPOSAL TO CURE PLAN DEFAULTS**

AND NOW COMES, CITIBANK, N.A., AS TRUSTEE FOR CMLTI ASSET TRUST ("Mortgagee"), secured creditor and mortgage lien holder on real property owned by Debtor(s) and located at 3658 Watson Road, Stow, NY 14785 ("the Property"), by its attorneys, Fein, Such, Kahn & Shepard, P.C., who hereby aver as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on the Property.
2. Debtors filed the instant Chapter 13 Bankruptcy Petition on September 22, 2019.
3. The debtor is currently due for the August 2022 post petition payment.
4. The debtor proposes a cure of the plan arrears and anticipates funds within six (6) months however it is unclear where the funds are coming from and when payment can be expected.

WHEREFORE, CITIBANK, N.A., AS TRUSTEE FOR CMLTI ASSET TRUST prays and respectfully requests that the Debtors be required to file additional information with the Court that details the source of income and payments.

Date: November 21, 2022

By: Tammy L. Terrell Benozza

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CERTIFICATE OF SERVICE

I, *Ruth Essington*, paralegal certify under penalty of perjury that I caused to be served the Objection to the Debtor's Notice of Proposal to Cure Plan Defaults on the parties at the addresses shown below or on the attached list on November 21, 2022.

The types of service made on the parties were: Electronic Notification and First Class Mail.

Service by Electronic Notification	Service by First Class Mail
<u>Debtor's Counsel:</u> Brian C. Thompson Thompson Law Group, P.C. 125 Warrendale Bayne Road Suite 200 Warrendale, PA 15086	<u>Debtor(s):</u> Martin J Viale Donna M. Viale 30 Ashley Road Gibsonia, PA 15044
<u>Trustee (if applicable):</u> Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219	
<u>US Trustee:</u> Office of the United States Trustee Liberty Center. 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222	